## REMARKS

Reconsideration and allowance of the above referenced application are respectfully requested.

Initially, Examiner Flanders, and his supervisor Mr. Isen, are thanked for the interview that was conducted on September 14, 2004. The items discussed during the interview are discussed below.

The drawings are corrected to add the label "prior art" to figure 1. This should obviate the rejection to the drawings.

The double patenting rejection based on claim duplicity has been obviated by canceling claims 49-94.

The rejection based on obviousness-type double patenting is noted, and will be dealt with at such time as the patent office indicates any claim as allowable.

Claims 1-6, 9-15, 18-20, 22-23, 26, 28-33, 36-37, 38-42, 45-47, 49, 50-54, 57-63, 66-68, 70-71, 74, 76-81, 84-90, 93, 95 and 97-112 stand rejected under 35 USC § 102 as being anticipated by U.S. Patent No. 6,119,091 (hereinafter "Huang"). Claims 7-8, 16-17, 21, 25, 34-35, 42-43, 48, 55-56, 64-65, 69, 73, 82-83, 91-92 and 96 stand rejected under 35 USC § 103 as being unpatentable over Huang.

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A number of these claims are respectfully traversed, while others of these claims have been obviated by amendment in order to obviate the rejections thereto.

Specifically, claim 1 has been amended to recite a programmable processor. That programmable processor is programmed to both receive media data, and also to decompress the media data. In this way, the same device; here the programmable processor, does two different things. This compares with Huang which uses two seperate devices for doing these two different functions. Because the prior art uses two different devices for doing these two different functions, the prior art would require more real estate on any substrate that holds the devices, as compared with claim 1. Hence, an advantage of claim 1 is that of saving on substrate real estate.

In addition, there may be times during operation when the system is not both reading and decoding at the same time. Therefore, this leads to the unexpected advantage that the same device can retrieve and decode without sacrificing performance to the extent that might be expected, and uses <u>less energy</u> than might otherwise be expected.

Huang does not teach or suggest this feature. Huang teaches a DSP 210 which fetches the data, and a separate media decoder 228 that decodes the data. Another words, as discussed

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above, two separate devices are used to retrieve and decode the data in Huang.

Therefore, claim 1 should be allowable, along with the claims which depend therefrom. A number of these dependent claims should be independently allowable, for reasons set forth herein.

Specifically, claim 5 specifies that processor which does all of these functions is on a single integrated circuit. Nowhere does Huang teach or suggest such a single integrated circuit.

Claim 7 specifies that the storage device stores the process that carries out the decompression of the compressed data. This is again nowhere taught or suggested by the cited prior art. Moreover, this produces the advantage that a general purpose media decoder can decompress any compressed data, since the decompression process is stored in the storage device.

Claim 8 specifies a determined decompression routine being stored on the disk, and retrieving that process based on a determined protocol. This is in no way taught or suggested by the cited prior part.

Claim 11 specifies a programmable processor which is programmed to retrieve media data and is also programmed to decompress the media data. This structure, where the same programmable processor does both retrieve and decompress, is in

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no way taught or suggested by the cited prior art, and should be allowable.

The dependent claims which depend from claim 11 should be analogously allowable for reasons discussed above.

Claim 20 specifies a integrated circuit to control and decode data from a storage device. This includes, as part of the integrated circuit, a digital signal processor for controlling the storage device, along with a storage controller, and that the digital signal processor includes a decoder that decompresses the media data that has been stored, and that all of this is all on one chip. This is in no way taught or suggested by Huang, and should hence be allowable. Huang does not suggest all of this on one chip.

Claim 21 defines subject matter which is allowable for similar reasons to those discussed above with respect to claim 8.

Claim 22 specifies that the same circuit is used for both the retrieving and the decompressing of media data, and hence claim 22 should be allowable for similar reasons to those discussed above along with the claims that depend therefrom.

Claim 24 and others stand rejected based on Huang in view of Seiler. This contention is also respectfully traversed. Claim 24 specifies supplying energy only during the time when the media data is being stored or retrieved, and therefore

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allows energy-saving as compared with the cited prior art. Huang does not teach this. Seiler was cited to show power management in a computer, and as part of that management, power is removed from certain subsystems after they are idle for a time. However, nothing in Seiler shows supplying energy to the storage device ONLY DURING the times of storing and retrieving. Seiler, in fact, teaches a system wherein conventional computer control is carried out. This system may turn off things like the hard drives after a certain amount of time; however it does not turn off the hard drive immediately after using it. In fact, Seiler teaches, as do most systems of this type, to keep the hard drives spinning for at least some amount of time. Therefore, it can fairly be said that Seiler teaches away from the subject matter of claim 24.

Claim 25 defines stored in the process for decompressing compressed data, determining the compression format, and retrieving the compression format. This is in no way taught or suggested by the cited prior art, for reasons stated above.

Claim 27 defines the energy is supplied to the media storage device only when the processor is retrieving the media data. This defines an energy-saving feature, which is no way taught or suggested by the cited prior art. Seiler does not teach this, and in fact can be fairly said to teach away from this, for reasons given above.

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Claim 28 defines a programmable processing means that is programmed for retrieving media data and also programmed to decompress media data. This is in no way taught or suggested by the cited prior art, and should be allowable for similar reasons to those discussed above.

The dependent claims should also be allowable, with claim 32 defining a single integrated circuit, claim 34 defining that the storage means stores the process for decompressing, and claim 35, for example, defining that a process is retrieved based on a determined compression format.

Claim 38 has been amended to recite that the processing means uses the same circuit for controlling the storage means and also for decompressing media data stored in the storage means. Therefore, claim 38 should be allowable along with the claims which depend therefrom. Claim 41 specifies a single integrated circuit. Claims 43 and 44 define storing processes for decoding.

Claim 47 specifies an integrated circuit and should hence be allowable along with claim 48 which depends therefrom, for at least the reasons discussed above.

Claim 95 defines an integrated circuit which should be allowable for reasons discussed above. In addition, however, claim 95 defines that the digital signal processing means

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converts the signal into an analog signal, and should be additionally allowable.

The claims that depend from claim 95 should be additionally allowable. For example, claim 96 should be allowable for reasons discussed above with respect to claim 8.

Claim 113 defines that processor controls energization and deenergization of the storage device in the storage circuit based on the media data that is stored in the memory. The storage of the media data in the memory controls energy consumption. This has the effect of enabling power savings, and is no way taught or suggested by the cited prior art. The Seiler reference may teach that certain sum systems such as the hard drive should be turned off after a specified amount of time. However, nowhere is there any teaching or suggestion that the storage of the media data controls the power consumption. Hence, claim 114 should be allowable along with the claims which depend therefrom.

Claim 115 defines that the storage circuit is deenergized by the processor when the amount of data is at least a first value. Claim 116 specifies energizing when the amount goes below a second value. Claim 117 specifies the processor controlling a counter that counts an amount of data that is transferred. Claims 118 and 119 define the way that counting is carried out. Claim 120 defines a timer, and claims 121 and 122

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defining how that timer is used. None of this is in any way taught or suggested by the cited prior art.

Certain ones of these claims were also rejected based on Blodgett who describes a DRAM power controller. Again, however, a DRAM power controller suggests nothing about the claim limitation. In fact, the claim limitation is directed to turning _off_ storage control when it is not be used. This is precisely the opposite of what would be done in Blodgett's device. In a DRAM device, power would always have to be applied. If power were removed, then the DRAM device could no longer operate; it would lose all of the data that it had. For this reason, it makes no sense to use a DRAM type power controller in the context of the present claims. Therefore, Blodgett actually teaches away from the system defined by claim 113, since it teaches a DRAM power controller which can never be totally deenergized.

Claim 123 defines an integrated circuit where the power is controlled in a similar way to that described above with respect to claim 113. Hence, claim 123 should be allowable along with the claims which depend therefrom.

Claim 133 also defines that the processor means controls energization and deenergization, and hence should be allowable for similar reasons to those discussed above. Independent claim 133 recites a processor that moves the media data from a device

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to a memory and controls energization of the storage device and a storage circuit in accordance with the media data stored in the memory. Huang does not teach or suggest this. Seiler is directed to a hibernation mode for a computer, to show processor control of energization. Seiler's energization control has nothing to do with the data stored in memory.

Claim 143 also defines energization and deenergization, and should be allowable for similar reasons to those discussed above, along with the claims which depend therefrom. Claim 143 also defines an integrated circuit that includes all of these functions, which again is not taught or suggested by the cited prior art.

Claim 153 defines a method of energizing a storage device that stores media data, after that energizing the storage circuit, and transferring media data via the storage circuit to a memory. This concerns the timing of energizing the storage device and read circuit. Neither Seiler nor Huang discuss this. This enables power savings which are not taught or suggested by the cited prior art.

The dependent claims which depend from claim 153 should be allowable for similar reasons.

Claim 161 defines a computer program with limitations which define the energizing, and should be additionally allowable.

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Independent claims 169-172 are directed to the user obtaining "first portions" of the media data, allowing the user to select, and then getting that selection. This enables a preview-like function. (These claims do not recite a processor that both retrieves and decompresses the media data.) Huang does not teach this. This preview-like function is much more than merely "transfers any amount of data", as alleged by the rejection.

The rejection states that Huang teaches and enables transferring "any amount of data". However, this is much more than simply enabling transfer of any amount of data. According to claim 169, the processor transfers first portions, and the allows a user to select one of those selections, and enables the processor to retrieve the remaining portion of that selection. This is in no way taught or suggested by the cited prior art, and should be allowable thereover. Claims 170 and 171 and 172 define analogous limitations, and should also be allowable for similar reasons to those stated above.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all

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pending claims (or other claims) that have not been expressed.
Finally, nothing in this paper should be construed as an intent
to concede any issue with regard to any claim, except as
specifically stated in this paper, and the amendment of any
claim does not necessarily signify concession of unpatentability
of the claim prior to its amendment.

In view of the above amendments and remarks, therefore, all
of the claims should be in condition for allowance.  A formal
notice to that effect is respectfully solicited.

Applicant respectfully requests that a timely Notice of
Allowance be issued in this case. However, should there remain
unresolved issues that require action, it is respectfully
requested that the Examiner telephone Scott C. Harris,
Applicant's Attorney, Reg, No. 32,030, at telephone number (858)
628-5070 so that such issues may be resolved as expeditiously as
possible.

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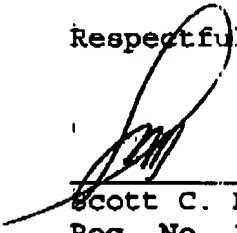26200.

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Respectfully submitted,

Date: September 24, 2004

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